

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

JUAN CARLOS CASTILLO RINCON

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CRIMINAL ACTION NO. H-18-200

**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE
TO TEMPORARILY MODIFY CONDITIONS OF BOND**

Defendant Juan Carlos Castillo Rincon (“Mr. Castillo”) seeks leave from this Court to temporarily modify the terms of his home confinement to allow him to search for a new residence within the Southern District of Texas.

Pursuant to the Court’s Pretrial Conditions of Bond, Mr. Castillo lives with his sister and brother-in-law at their home in the Southern District of Texas. The Court confined Mr. Castillo to this house during the pendency of the above-captioned matter as part of his pretrial conditions of bond, and he is being electronically monitored to ensure compliance with those conditions. The terms of Mr. Castillo’s pretrial bond allow him to leave the home only for medical or religious reasons, and to visit with his attorneys.

Mr. Castillo’s sister and brother-in-law recently informed him that they will be required to move from their home due to a work transfer, and that they intend to move on or before the termination of their lease, which is February 2019. Mr. Castillo will not be able to remain at this residence after their departure. Accordingly, Mr. Castillo seeks Court permission to modify his bond conditions to permit him to leave the home to search for and view new residences. Once Mr.

Castillo locates a new residence, he will file another Motion with the Court seeking permission to transfer his residence and home confinement to his new residence.

Counsel for Mr. Castillo has consulted with attorneys for the Government and with Mr. Castillo's probation officer and they are not opposed the proposed temporary modification.

Respectfully submitted,

RUSTY HARDIN & ASSOCIATES, LLP

/s/ Derek Hollingsworth

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**ATTORNEYS FOR DEFENDANT
JUAN CARLOS CASTILLO RINCON**

CERTIFICATE OF CONFERENCE

I hereby certify that I have communicated with U.S. Attorney's Office by email regarding the matters addressed in this Motion, and the Government is unopposed to the relief sought herein.

/s/ Derek Hollingsworth
Derek Hollingsworth

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties.

/s/ Derek Hollingsworth
Derek Hollingsworth